



Submission to the Productivity Commission

Childcare and Early Learning

3 February 2014

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Introduction

The Creche and Kindergarten Association Limited (C&K) thanks the Productivity Commission for the opportunity to provide input into the Childcare and Early Childhood Learning public inquiry.

C&K is a leading, not for profit early childhood education and care (ECEC) provider with more than 107 years of experience. C&K is proud to support more than 20,000 children, 6,000 families and 2,000 staff through our long day care and kindergarten services, family day care schemes, limited hours care, in home care and outside school hours care programs. C&K ensures that children come first, in all of its activities.

C&K's Key Messages

This submission addresses the scope of the Commission's Terms of Reference (TOR) and provides comments and recommendations where C&K has relevant experience, views and evidence. C&K wishes to deliver the following key messages to the Commission:

1. It is imperative that the best interests of the child be the guiding principle against which any proposals for reform are tested.
2. The short and long term benefits (social, emotional, academic and economic) of investing in ECEC are widely known and supported. Australia must increase investment in ECEC.
3. Investment in ECEC must support accessibility and affordability for families. Evidence shows that access to a high quality ECEC program increases when parent's out-of-pocket fees are low or no cost.
4. Participation in ECEC programs continues to be lower for the most vulnerable children; therefore adequate investment is required to support families with children with a disability, living in disadvantaged communities, children at risk of abuse and neglect and children and families from culturally and linguistically diverse (CALD) backgrounds and Aboriginal and Torres Strait children and families.
5. Co-ordinated Commonwealth, State and local Government involvement in ECEC policy, compliance and funding is critical to successfully implementing a universal approach to accessibility, affordability and quality of ECEC program delivery.



6. The National Quality Framework is essential to maintaining minimum quality standards.
7. Investment in developing and sustaining a professional ECEC workforce is the basis for delivering high quality ECEC services to families and further and ongoing investment will be required.
8. Workforce participation will increase if families can access a high quality ECEC program that is affordable.

Terminology

C&K encourages the Commission to:

- use the term 'early childhood education and care' (ECEC) rather than 'childcare' as ECEC is internationally recognised and is also adopted nationally as part of the National Quality Framework (NQF) reforms. The term childcare has a primary focus on the needs of secondary stakeholders including parents, employers and government, rather than the child
- use the inclusive and gender-neutral term 'primary caregiver' in preference to 'mother'
- widen the definition of 'parent' and 'family' to include care-givers, guardians, foster and kinship carer arrangements.

TOR 1 – The contribution that access to affordable, high quality childcare can make to increased participation in the workforce and optimising children’s learning and development

C&K believes that every child is entitled to access an affordable, high quality ECEC program from birth through to starting school.

In 2011, Australia’s contribution to pre-primary education as a percentage of Gross Domestic Product (GDP) was 0.1%, well short of the 0.8%+ invested by Denmark, Iceland, Israel, Luxembourg and Spain, countries that have significantly higher enrolments and outcomes than Australia. Source:

[http://www.oecd.org/edu/eag2013%20\(eng\)--FINAL%2020%20June%202013.pdf](http://www.oecd.org/edu/eag2013%20(eng)--FINAL%2020%20June%202013.pdf)

In 2011 each of these countries had a higher enrolment rate at age 4 in early childhood education than Australia’s 67% (OECD average of 84%). Thirteen percent of Australian 3-year-olds are enrolled in early education programs, significantly lower than the OECD average of 67%. In a 2012 benchmarking study, Australia ranked 28 out of 45 nations by the Economist Intelligence Unit in its commitment to quality, accessibility and affordability of early education.

There is extensive research literature demonstrating the positive benefits of ECEC on children’s development and later life outcomes. For example, a longitudinal study conducted in Queensland showed that children who had attended a dedicated kindergarten program had higher levels of competence at entry in the preparatory year of schooling.

James Heckman, a Nobel Laureate in Economics and internationally renowned expert in the economics of human development, is a leading advocate and campaigner for investment in early childhood development, to see greater returns in education, health and productivity. He recommends a ‘sooner the better’ approach:

“The highest rate of return in early childhood development comes from investing as early as possible, from birth through age five, in disadvantaged families. Starting at age three or four is too little too late, as it fails to recognise that skills beget skills in a complementary and dynamic way. Efforts should focus on the first years for the greatest efficiency and effectiveness. The best investment is in quality early childhood development from birth to five for disadvantaged children and their families” (James J Heckman, December 7, 2012).

Twenty-two percent of Australian children are starting school developmentally vulnerable, based on the Australian Early Development Index. Evidence from



international testing programs such as the Programme for International Student Assessment (PISA) shows that children from low socioeconomic backgrounds can be 2 years behind their same age cohort on starting school.

Universal access to quality ECEC services for all children from birth will bring life-long benefits for the individual child, their family, and society. The research notes the critical importance of the first 3 years of a child's life, and while C&K supports universal access to early education programs for 4-year olds in the year prior to schooling, it is clear that additional benefits could be achieved through earlier support, particularly for those living in poverty, indigenous children, children with disabilities, children with additional needs and children with culturally and linguistically diverse backgrounds.

Recommendation

1.1 Australia needs to continue to increase its investment in early childhood education and care to improve universal access and participation for vulnerable and at risk children and improve its ranking with the top performing OECD countries in this area.

TOR 2 – the current and future need for ECEC in Australia

C&K holds a unique place in the sector as it operates seven types of ECEC programs:

- Stand-alone Kindergartens and Kindergarten Programs integrated into Long Day Care
- Long Day Care
- Family Day Care
- Limited Hours Care
- In Home Care
- Outside School Hours Care
- Integrated Children and Family Centres (e.g. Mackay Children and Family Centre).

Types of childcare available and hours of operation

a. Kindergarten

As Queensland's leading provider of kindergarten programs (delivered in the year prior to Prep) and operates 186 Affiliates, 5 Associates and 140 Branch kindergartens.



C&K services have, on average, maintained high occupancy rates and waitlists in some areas despite an extra 150 services (or 6,600 places) being established and kindergarten programs being introduced into long day care services in 2010. C&K kindergarten services provide a part-time early childhood education program (600 hours per year) operating only during school terms. Generally the opening hours are consistent with school hours, although some services offer two long days (7½-hours) and three shorter days (5-hours) to provide increased flexibility and choice for families.

C&K's enrolment history demonstrates that this part-time model of ECEC remains relevant and meets the needs of many families who may have some of the following lifestyles: stay at home care-giver; parents who work from home; parents who work flexible or part-time hours; involvement of extended family members (i.e. grandparents who assist with drop off and pick up); or families who use other forms of care such as family day care together the kindergarten program.

These families report that they prefer and choose the C&K model over the long day care approach for a number of reasons including: the primary focus on the best interests of the child in terms of early education; consistency of children in the group (not different children enrolled on different days); and consistency of staff (the same teacher and assistant with the children the entire day, and year and low turn-over of staff).

Some C&K services have reported a demand for after-kindergarten care in the afternoons. As such, C&K would support investigating extended hours kindergarten models to build greater flexibility for kindergarten services to meet the needs of families, while still offering a quality early education program. Where kindergarten services are co-located on schools sites that provide Outside School Hours Care (OSHC) services, kindergarten-age children have been able to access such services in Queensland since 2012. It is C&K's view that those OSHC services providing dedicated and separate areas for younger (e.g. kindergarten to Year 3) and older (year 4 to 7) children, provide a higher quality service that is in the best interests of the children. Where OSHC is not available or not suitable for kindergarten-age children, C&K would support delivering extended hours kindergarten models to better meet the needs of working families.

Recommendations

2.1 That given the high quality of service provision offered and the high demand in many areas for the kindergarten model, that this model be maintained as part of Australia's early childhood education and care system.

2.2 That consideration is given to further developing the kindergarten model to increase the flexibility of hours of care offered, such as extended hours kindergarten and integration and co-location of kindergartens with OSHC and other early childhood and family support services.

b. Long day care

C&K operates 29 long day care (LDC) services. Enrolment patterns in C&K LDCs show that most families enrol their child for two to three day per week and balance the LDC ECEC program with other care providers e.g. grandparents. The table below shows the number of days per week that children are enrolled in C&K long day care services and demonstrates a similar pattern for both metropolitan and rural services.

Service Location	Number of children enrolled					Average Enrolment Booking
	1 day / week	2 days / week	3 days / week	4 days / week	5 days / week	
Metropolitan	9	19	20	8	2	2.6 days
Rural	19	32	9	2	5	2.1 days

All of C&K's LDCs incorporate a kindergarten program that operates for 600 hours per year, enabling quality ECEC delivery while meeting needs of working families.

Recommendation

2.3 C&K support the LDC model with kindergarten programs incorporated as this model appears relevant in both metropolitan and rural communities.

Integrated models of service delivery

C&K supports centre based and mobile integrated models of service delivery, where families can access ECEC, maternal and child health care, family support and parenting and family support at the one service. There are numerous models across Australia such as the integrated child and family centres in Queensland (Early Years Centres), South Australia, Victoria and Tasmania and the federally funded Child and Family Centres (10 operating across Queensland) and programs such as Sure Start in the UK to explore. C&K operates one of these Child and Family Centres in Mackay. These models are based on partnership, co-location and joint planning and offer a 'one stop shop' for parents where a range of early childhood and family support programs are offered. . In some instances packaging funding differently can



facilitate partnership and more integrated service delivery, improved service access and better outcomes for families and children.

The integrated service model helps to meet the needs of our most vulnerable children by providing a range of 'soft entry' points for difficult to engage and at risk families and children. Centre based and mobile models mean that services can be offered in a range of locations that help parents become engaged with the services and target those parents that may not normally access services.

Recommendation

2.4 That the Australian Government and State Governments explore the option of increasing the number of integrated child and family centres incorporating early childhood education and care, early childhood health, family support and parenting programs.

Rural, regional and remote ECEC services

While surplus or profit can be made operating services in metropolitan areas, it is more difficult to operate at a surplus or break even in regional and remote areas, resulting in reduced or limited ECEC options in such areas. The table below indicates the number of C&K Kindergarten services located in Brisbane, regional areas and remote areas.

Service Type	Brisbane	Regional	Remote
Associate	2	1	2
Affiliate	53	103	30
Branch	31	98	11
Total	86	202	43
Percentage	26%	61%	13%

Flexible funding and different service delivery models may need to be considered for regional and remote services, including integrated child and family centres and long day care models including kindergarten without the rigid age criteria for kindergarten funding.

In very small communities, family day care or in home care often represents the only viable ECEC service. Strong partnerships with visiting groups like Remote Area Family Service and playgroups can help to provide opportunities for peer interaction among young children. As a not-for-profit organisation, C&K derives a surplus at

services where it is viable to do so, so that it can continue to subsidise services in disadvantaged communities that would otherwise close.

ECEC services in rural and remote areas have difficulty attracting and retaining suitably qualified staff. Initiatives to support the attainment of qualifications and to financially support and reward staff moving to rural and remote locations have, to date, had minimal effect on improving the recruitment of staff in these areas. C&K requests the Productivity Commission to consider the following.

Recommendations

2.5 Partnerships between ECEC services and state education departments / schools to recruit and access qualified ECEC teachers to work part-time across the ECEC service and the local state school

2.6 Allow assistants to enrol in an ECEC course within 3 months of commencing a position.

Access to affordable ECEC services

A number of C&K parents have raised concerns about the cost of ECEC. During 2013, C&K experienced a significant increase in overdue fees and a number of families removed their child from the ECEC service due to financial pressures.

The current level of funding for ECEC services is insufficient. The Child Care Benefit (CCB) available to families has not kept up with the rising cost of living, wages and increasing fees. The Child Care Rebate (CCR) has not increased since 2011. Parents take the amount of rebate and subsidy into account when determining the number of days they will enrol their child into an ECEC service.

The current CCB and CCR payment systems are confusing and difficult for families to compare their out of pocket expenses for different ECEC service types.

Anecdotally, families have informed C&K that some LDCs seek higher fees and payment for longer hours than that required by the family (e.g. charging for a day of education and care when a shorter session is required).

Pricing is complex and depends upon multiple factors such as government funding, location, population of eligible age children, utilisation, proximity of competitors and staffing costs. C&K is committed to paying its educators wages that are comparable to those received by educators in the state school system, which is higher than those under the modern award for the sector.

Recommendations

2.7 C&K strongly support the premise that affordability should be equalised across all ECEC service types, with out of pocket expenses for families comparable across different ECEC service types.

2.8 Eligibility of government subsidies should not be based on ECEC service type. A single payment system across all ECEC service types that allows parents to **choose the ECEC program best suited to their child's needs and obtain comparable benefits would be greatly welcomed.**

The needs of vulnerable or at risk children

Participation continues to be lower for the most vulnerable children in Australia, therefore adequate funding is required to implement innovative and flexible programs and services that encourage families with children with a disability, living in disadvantaged communities, children at risk of abuse and neglect and children and families from culturally and linguistically diverse (CALD) backgrounds and Aboriginal and / or Torres Strait children and families to access ECEC programs.

Despite Queensland's rapidly growing kindergarten participation rate, in 2012, 23 per cent of eligible children did not access a kindergarten program. Across all forms of ECEC, participation is lower for the most vulnerable children, that is, children from low socioeconomic backgrounds, Aboriginal and Torres Strait Islander children, children with a disability, children with additional needs and children from CALD backgrounds.

C&K has observed that there is an increasing complexity of children's needs. In the area of supporting children with disability, there are pockets of success, where services have essentially specialised in providing an inclusive service for a particular disability and gained a reputation as a service of choice among that disability group. For example C&K is aware of a service with a reputation for providing quality programs for children with autism and has a high percentage of children with autism enrolled at the service. However, there is a risk that an over representation of one group of children in a service moves it away from a mainstream service. With several children meeting a diagnosis for autism, the service is able to access extra funding from government that enables the engagement of extra support staff. With only one child with disability at the service, the funding would not be sufficient to engage a full-time support worker.

Our Affiliate Services often need to fundraise to meet the extra costs of providing inclusive programs for children with disability and other high support needs. In addition some existing staff members report that they are not confident they possess

the highly specialised skills needed when they have one or more child with a disability or additional needs in their group. Currently, funding for children with disability is dependent on a diagnosis and for very young children this is not always available, particularly in regional and remote areas. Some families withdraw their child from a service when there is inadequate support for a child with additional needs who can become a danger to themselves and others.

In 2013, the Australian Government changed its guidelines for Inclusion Support Services (ISS). Historically, ISS has not been available to preschool/kindergarten services; only children with disability attending a long day care service are eligible for support. In 2013, the Australian Government broadened the definition of preschool/kindergarten service to include preschool/kindergarten *programs* offered at long day care services. This means a child attending a kindergarten program for part of the day though their LDC is not eligible for ISS during this period of enrolment. This change has added unnecessary complexity to an already complex system and denied children with disability access to inclusion support at a mainstream long day care service because it is providing a high quality early education program. Notably, it is now a requirement for all long day care services to provide an early education program based on the Early Years Learning Framework (EYLF) and engage a qualified early childhood teacher— regardless of whether it's called kindergarten or preschool or early learning or child care. It is C&K's view that ISS should be available to all children with disability regardless of their choice of ECEC service.

Recommendations

2.9 C&K encourage the Government to **increase funding levels for inclusion support and explore how to expand the inclusion support model to adequately provide for more vulnerable children entering the ECEC. We note that National Disability Insurance scheme will result in an increase of funding in the disability service system and the capacity of carers to access additional support services.**

2.10 In relation to at risk children, children from Aboriginal and Torres Strait Islander and CALD communities refer to text at “Integrated Models of Service Delivery and recommendation 2.4”.

2.11 It is important that Government recognises that a **one size fits all approach will not work as the needs of communities and client groups varies. We support design, trial and evaluation of a range of varied service delivery approaches and models.**



TOR 3 - International models of ECEC

C&K is aware of and supports the Productivity Commission's intention to research overseas models of ECEC.

The Scandinavian countries of Norway and Sweden focus on supporting families to educate and care for their children until 2 years of age, after which time financial support is provided to families to access high quality and affordable ECEC until their child commences school. (<http://www.norden.org/en/publications/publikationer/2011-562>)

In Italy, the Reggio Emilia approach promotes greater staff to child ratios and visiting specialist teachers. (<http://www.reggiochildren.it/?lang=en>)

New Zealand's home-based care program is similar to Australia's in-home care model. However, the New Zealand model is targeted at families and children meeting specific inclusion criteria, for example, a child with a disability, multiple births of triplets or more and where there is a lack or unsuitability of mainstream ECEC services.

(<http://www.lead.ece.govt.nz/ManagementInformation/EstablishingAnECEService/EstablishingAHomeBasedService.aspx>)

Recommendation

3.1 C&K request that the Productivity Commission investigate the ECEC models used in Scandinavia, Italy and New Zealand.

TOR 4 – Options for enhancing the choices available to Australian families as to how they receive ECEC support

Any funding model must be highly flexible to enable families to choose the ECEC program of their choice rather than the program that is most affordable. In an equitable system, the out-of-pocket costs of each ECEC option would be comparable for families of similar income levels.

In small communities, a multi-age room operating long day care hours is likely to be the most viable ECEC option as there are often insufficient children to maximise enrolments in any one age group. If the service engages a qualified early years' teacher, kindergarten-age children can access an approved kindergarten program prior to school, while younger children receive age-appropriate education programs. Fee models for these services need to be flexible, so families only pay for the service they need (e.g. part-day ECEC or full-day ECEC). These services require a higher

level of operational funding support as the number of enrolments and thus daily fees, are generally insufficient to meet operating costs.

C&K believes that it is essential that affordable and quality education and care programs are available with subsidies to offset the out-of-pocket expenses for families. An ideal outcome would be that a broad range of ECEC services providing inclusive programs for all, regardless of a family's ability to pay or their employment circumstances are readily accessible.

Recommendations

4.1 The Commission could consider a funding scheme whereby current funding for parental leave, preschool and child care is centrally held and accessed. Potentially up to 600 hours per year of quality ECEC could be available to all children from 12 months of age, or at least for children from disadvantaged families. With the introduction of paid parental leave, there is likely to be less demand for ECEC from external providers in the first 12 months of a child's life. From age 12 months, the universal entitlement to ECEC programs could be provided by a range of service providers, provided quality requirements are met.

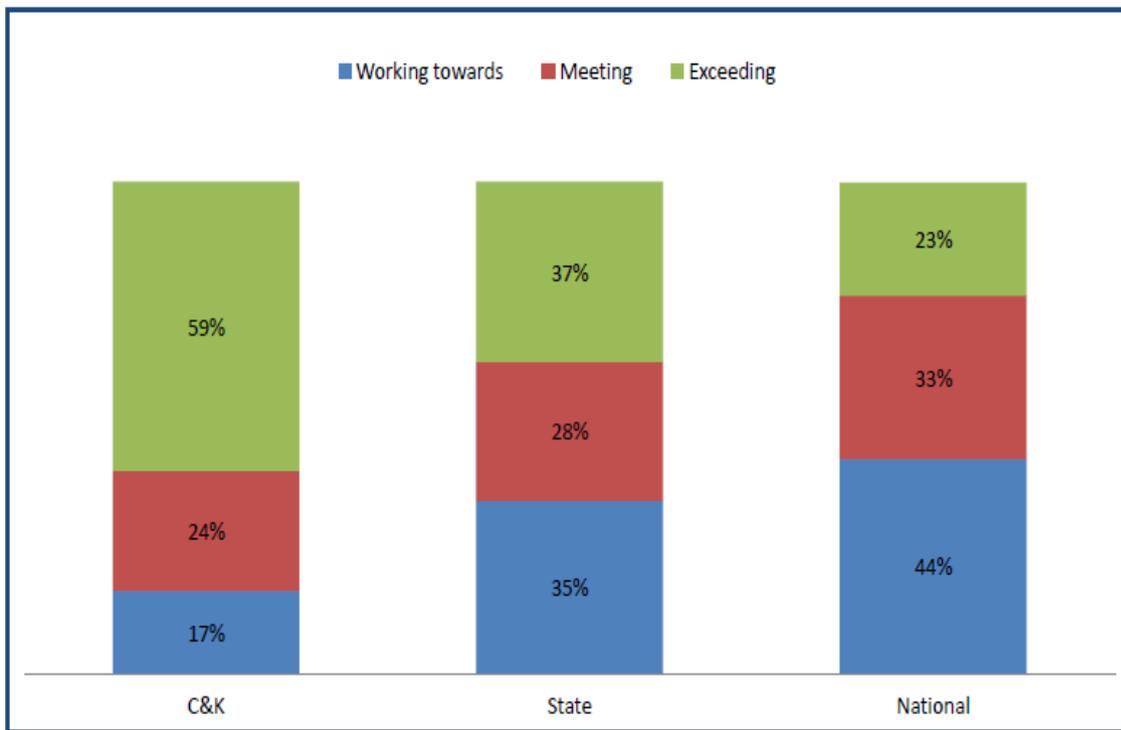
4.2 Vouchers or an access card could be provided to parents to use at any NQF service of their choice (including in-home care in the future) to access their universal entitlement for children aged 12 months to school age, with top up of fees paid for any additional education and care that is required. It is likely that ECEC fees would need to be regulated for a core, quality service to avoid price gouging. ECEC services may then choose to add extras to their core offering such as language lessons but the cost of these added extras would need to be met by families opting for the service.

4.3 Families who choose to care for their own children could claim the voucher as part of their annual tax return thereby reflecting the valid and different choices families make in raising their children. Families participating in work, study or training would continue to be able to access additional assistance to meet the costs of ECEC. It is suggested that any fee subsidies be provided directly to the service, with parents paying the fee gap as an out-of-pocket expense (similar to the approach with Medicare).

TOR 5 – Benefits and other impacts of regulatory change in the ECEC sector

C&K welcomes and strongly supports the National Quality Framework (NQF) as it provides clear and consistent standards for ECEC service delivery. The impact of the NQF on C&K services has been minimal, as most C&K services were already operating well above the minimum standards prescribed in the NQF. The table below shows the national assessment and rating summary for C&K services through to August 2013.

C&K State National Assessment and Rating Summary



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Version 1.0 Correct at time of printing 2 August 2013

C&K believes that there will be significant impact on services when the ratio for 2 – 3 year olds changes from 1:8 to 1:5 in 2016. Sourcing appropriately qualified staff may prove difficult and the additional wages required to meet this ratio will result in increased daily fees if the current funding system remains unchanged.

As previously noted, there is difficulty attracting staff members to rural and remote areas. Under the NQF a Certified Supervisor is always required to be on site. This requirement can be difficult to meet in rural and remote areas as the sole Nominated Supervisor needs to work the full opening hours of the service to keep it compliant with the legislation.

C&K has concerns about the ability to engage a primary school teacher for 12 weeks under relief arrangements in the NQF.

Recommendations

5.1 C&K recommend that the NQF in relation to qualification requirements in rural and remote communities be reviewed to allow greater flexibility where staff with qualifications are not available or are undertaking recognised training.

5.2 C&K recommend that the NQF allow for the hiring of a relief educator with ECEC experience, in the first instance, rather than a teacher with no ECEC experience. In this regard, C&K would seek to give preference to a Diploma level qualified ECEC educator.

Government involvement in ECEC

C&K believes that the Commonwealth Government has a clear role to set ECEC policy directions, monitor and enforce compliance as well as provide adequate ECEC funding to services and / or families. It also falls within the Commonwealth's responsibility to ensure staff members working in the ECEC sector are remunerated appropriately and in alignment with the professional qualifications that they hold.

C&K supports the role of state and territory governments as regulators of ECEC services under the National Law. C&K also supports local governments as the assessors and approvers of building planning and development applications for new and extended ECEC services.

In addition, C&K supports partnerships between all levels of governments to facilitate the delivery of quality ECEC programs in geographical areas of market failure, particularly in small, rural and remote communities. Local and State Government could provide an appropriate facility (with financial support from the Commonwealth) and engage an experienced ECEC approved provider to operate the service for the local community. This latter approach is similar to the Queensland Government's strategy for providing universal access to kindergarten programs. The Government has constructed more than 150 high quality ECEC facilities on state school sites since 2010 and then leased these services to C&K and other experienced ECEC approved-providers to operate kindergarten and/or early learning and care centres.

With the Commonwealth focused on birth to school age, and the state and territory governments on school age, both levels of governments must work together to facilitate transitions from the ECEC sector to school.

Under the NQF, educators must be enrolled in their course before starting work.



However, it would be beneficial for staff to gain some in-service experience to see if ECEC is the career field for them, before going through the expense of enrolling in a qualification. Historically, Queensland has found the requirement to be enrolled in an appropriate course within 3 months of starting work sufficient to identify those staff with an aptitude and desire to continue to work in the ECEC sector.

C&K notes that under current workplace agreements, teachers/educators in long day care services have the least non-contact time (as little as two hours per week), yet these teachers/educators have the largest number of children to plan and report on. In C&K kindergarten services with two stable groups of children attending each week, generally there are no more than 48 children to educate in a year. However, there may be up to 60 kindergarten children in a long day care service in any one-week period.

A recent market research study conducted by an independent research agency on behalf of C&K shows that parents value the standard of care provided by educators, the environment created by the service staff and how the program prepares their child for Prep / primary school the most, when deciding where to enrol their child. The study also determined that parents typically equate the quality of a service with the quality of the staff employed at the service. This is vitally important when analysing possible ECEC workforce initiatives.

Recommendation

5.3 C&K suggest that the amount of non-contact or programming time available to educators listed in the modern award needs to take account of the number of children attending each week.



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APPENDIX A: SURVEY FEEDBACK FROM C&K AFFILIATE SERVICES

In December 2013, C&K surveyed its affiliate kindergartens, requesting feedback on the questions asked in the Productivity Commission’s Childcare and Early Learning Issues Paper. The responses are detailed below. It is worthwhile noting that C&K affiliate services are independent incorporated associations that are managed by an elected, volunteer parent management committee. The names of the service and contact details have been withheld for privacy reasons; the Productivity Commission can contact C&K for these details if they require them.

Page 2, Q13. Government involvement in childcare and early learning

What role, if any, should the different levels of government play in childcare and early childhood education?
 What outcomes from ECEC are desirable and should be made achievable over the next decade?

1	Funding will always be needed from the government to provide quality kindergarten education.	Jan 3, 2014 4:49 AM
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Page 2, Q15. Changing demand for ECEC

The Commission is seeking empirical evidence on demand for ECEC, in particular:
 • are there families from particular household structures, socioeconomic groups or geographic areas that are now using some forms of ECEC significantly more than in the past?
 • which type...

1	Families with health care cards and in poor economic area are now accessing kindergarten more as there are few out of pocket expenses. Families with 2 working parents on a lower income or with high debt levels find paying for Kindergarten difficult. They have too much money to have a health care card but still find child care or kindergarten fee's hard to pay.	Jan 3, 2014 4:49 AM
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Page 2, Q16. Children's development needs

The Commission is seeking evidence on the effect of the different types of ECEC, including separate preschool programs, on children's learning and development and preparedness for school.

How does the amount of time spent in ECEC and the age at which a child f...

1	Each child is different, so there is no perfect age to start ECEC for everyone. I believe the kindergarten starting age of 3.5 - 4years is a wonderful age to begin but this is not feasible financially for all families. Extending the length of the kindergarten day would not produce any educational benefit, as most children have taken in all the information they can at the end of a 6 hour day. Extending hours would however suit some parents working hours.	Jan 3, 2014 4:49 AM
2	Extended hours are not desirable for very young children. A child-friendly kindergarten program is designed to provide a time for learning that is focused and enjoyable. A long day is emotionally and physically draining to a small child and this can reduce their engagement in activities provided by educators. Traditional short day kindergarten programs are reflective of the needs of children.	Dec 13, 2013 6:13 PM



Page 2, Q17. Impacts on workforce participation

What is the relative importance of accessibility, flexibility, affordability and quality of ECEC (relative to other key factors) in influencing decisions of parents as to whether they work or remain at home to care for children?

What trade-offs do working ...

1	If kindergarten is affordable, of a good standard and easy to access, some parents may feel more confident about returning to work. Working parents (such as myself in years gone by) will often choose a lower quality program if it close to their home. Positions in child care were always competitive, so you would have to take what you could get. More mothers working has definitely increase demand for childcare. I don't believe more demand has always led to more quality however. In the past staff qualifications were not very high in childcare. Demand for kindergartens places have been higher in the past as their staff were often more qualified and had more teaching experience.	Jan 3, 2014 4:49 AM
2	There are many options for working families in our area to access long hours day care which also provide Kindy programs. Our centre still only provides a short hours Kindy program and given we have had very limited vacancies at our centre in the past few years we feel the demand for this service is still high. Some families with two working parents have accessed our short hours centre by employing a Nanny or Family Day Care professional to provide care before and after Kindy or by relying on the support of Grandparents to drop off and pick up children. Many siblings of children attending our centre also attend the State Primary School next door. This school has a out of school hours care facility that children at our service are not able to access due to their age. It would be helpful to many of our families if their Kindy child could access this service and may increase the capacity of our service to provide for families that access the school.	Dec 13, 2013 6:13 PM

Page 2, Q18. Availability of childcare and early learning services

The Commission is seeking evidence on:
• the extent to which parents are experiencing difficulties accessing ECEC that meets their needs/preferences and whether there are particular categories of care, times, locations or circumstances fo...

1	Our centre has it's own website and one attached to the C and K Kindergarten main page. Most parents access this website to find out information about our centre when considering enrollment.	Dec 13, 2013 6:13 PM
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Page 2, Q19. Availability of childcare and early learning services

The Commission is seeking information from ECEC providers on:
• how the sector has responded to growth in demand, including changes to types of care offered, cost and pricing structures used by different types of providers, and any viabili...

1	Having triplets and health care card holders able to access support with the cost of Kindy has been very positive step to increasing participation of those groups in our program.	Dec 13, 2013 6:13 PM
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Page 2, Q21. Flexibility of childcare and early learning services

The Commission is seeking information on:

- the extent and nature of unmet demand for more flexible ECEC
- the reasons why current providers are not offering more flexible care options
- the experiences of providers who offer flexible car...

1	Currently our kindergarten only offers a 8.45am - 2.45pm on a 5 day fortnight model, as this is the program requested by a majority of our parents. Financial incentives to try a new approach would encourage kindergartens to give it a try because a change to shorter weeks and longer days may have mean kindergartens loose money at first. It is hard to predict how the change may effect enrolments and no kindergartens can afford to run at a loss.	Jan 3, 2014 4:49 AM
2	There are many options for working families in our area to access long hours day care which also provide Kindy programs. Our centre still only provides a short hours Kindy program and given we have had very limited vacancies at our centre in the past few years we feel the demand for this service is still high. Some families with two working parents have accessed our short hours centre by employing a Nanny or Family Day Care professional to provide care before and after Kindy or by relying on the support of Grandparents to drop off and pick up children. Many siblings of children attending our centre also attend the State Primary School next door. This school has a out of school hours care facility that children at our service are not able to access due to their age. It would be helpful to many of our families if their Kindy child could access this service and may increase the capacity of our service to provide for families that access the school.	Dec 13, 2013 6:13 PM

Page 2, Q22. Services for additional needs and regional and remote areas

The Commission is seeking information on:

- how well the needs of disadvantaged, vulnerable or other additional needs children are being met by the ECEC sector as a whole, by individual types of care, and in particular regions
- the...

1	I don't believe children with additional needs always get the assistance they require. Often significant paperwork/reports are needed and families just don't have it. Often kindergarten teachers are the first to pick up special needs but this happens within the first 6 months. Then it takes time for families to see a paediatrician and when reports finally are received the funding window is gone. Our kindergarten will often shoulder the costs of additional needs aides as the children don't have the paperwork required.	Jan 3, 2014 4:49 AM
2	Our centre budgets to support families with children who require extra care. Many children who require extra support at young age may not have the required paperwork to access government funding for these additional need services. Kindergarten Teachers are often the first to support parents to access the health professionals required to support their children. More funding for early identification programs and public health initiatives to support parents and kindergartens with early intervention services would be welcomed.	Dec 13, 2013 6:13 PM

Page 2, Q23. Cost of childcare and early learning services in Australia

The Commission is seeking information and where possible quantitative evidence on:

- financial difficulties arising from paying childcare fees, including the types or location of families experiencing the greatest difficulties in meet...

1	The kindergartens in our area all need to be financially competitive. Even if our costs rise we need to keep our fee's on a par with similar kindergartens around us. Often funding pressure is then placed on parent committee's. As a director my work demands are huge but committee's can't afford to pay me the overtime required for me to do my job well. This makes keeping staff difficult as we are not getting paid for all the extra hours. High staff tum over reduces the quality of education provided.	Jan 3, 2014 4:49 AM
2	Having triplets and health care card holders able to access support with the cost of Kindy has been very positive step to increasing participation of those groups in our program	Dec 13, 2013 6:13 PM

Page 2, Q24. Government regulation of childcare and early learning

The Commission is seeking up-to-date evidence, specific examples and case studies that will inform an assessment of both the benefits and costs of current regulations impacting on ECEC services.

- | | | |
|---|--|---------------------|
| 1 | The costs of the current regulations on ECEC services is that there is huge administrative demands on Directors. Higher work demands mean that Directors are requesting to be paid for all the extra hours. Small kindergarten's can't always afford the extra pay but want to keep quality staff. | Jan 3, 2014 4:49 AM |
|---|--|---------------------|

Page 2, Q25. Workforce issues and the effects of the National Quality Framework

The Commission is seeking views and evidence on:

- the effect of increased staff ratios and qualification requirements on outcomes for children
- how ECEC providers are handling the pace of implementation of new staffing rat...

- | | | |
|---|---|----------------------|
| 1 | Increased staffing costs incurred by NQF have already been passed on to parents at our centre. I am now paid for an extra 6 hours work a fortnight, to cover higher administrative demands. | Jan 3, 2014 4:49 AM |
| 2 | Increasing staff ratios is an excellent way to increase children's engagement and participation in programs. | Dec 13, 2013 6:13 PM |

Page 2, Q26. Workforce issues and the effects of the National Quality Framework

The Commission is seeking information on:

- initiatives of governments to address workforce shortages and qualifications, including the cost and effectiveness of these initiatives
- initiatives of providers to address their w...

- | | | |
|---|---|---------------------|
| 1 | To attract 4 year qualified teachers to the childcare industry you need to offer them working conditions similar to kindergartens and state schools. If these don't get similar working hours and holidays to colleges in kindergartens and schools, then they simply won't stay. | Jan 3, 2014 4:49 AM |
|---|---|---------------------|

Page 2, Q28. National Quality Framework

Could the information provided on the 'My Child' website be changed to make it more useful or accessible to families? Are there other approaches to providing information to parents about vacancies, fees and compliance that should be considered?

- | | | |
|---|--|---------------------|
| 1 | The "My child" website could be advertised better. Parents don't access it because they don't always know it is there. | Jan 3, 2014 4:49 AM |
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Page 2, Q29. Other regulations

The Commission is seeking information on:

- how particular regulations (including the NQF) impact on the structure, operations, cost and profitability of ECEC services — for example, are services consolidating or amalgamating their operations to reduce administration costs

- | | | |
|---|--|---------------------|
| 1 | Regulations and NQF have meant that our centre now pays both directors for 6 hours of additional administrative work per fortnight. Previously 3 hours were allocated. This makes our centre less profitable as these funds need to come from somewhere. | Jan 3, 2014 4:49 AM |
|---|--|---------------------|

Page 2, Q30. Options for regulatory reform

How could the NQF and other regulations affecting ECEC be improved — both requirements and their implementation/enforcement — to be more effective and/or to reduce the compliance burden on ECEC services or workers and/or administration costs for governments?

Ar...

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|---|--|---------------------|
| 1 | I believe kindergarten would be better left self regulated. If parents do not believe our centre is providing a quality education they simply will not enrol and our service will close. | Jan 3, 2014 4:49 AM |
|---|--|---------------------|



Page 2, Q31. Government support for childcare and early learning

Some general questions about government support:

- How does government support to families and childcare providers impact on accessibility, flexibility and affordability of childcare?
- Is the level of overall government support for ECEC ap...

1	Funding levels should be increase to compensate for the increased workload of teacher/directors/aides in the ECEC sector.	Jan 3, 2014 4:49 AM
2	Ultimately it would be wonderful if it was free to access a Kindy program for all QLD children.	Dec 13, 2013 6:13 PM

Page 2, Q34. Options for reform of childcare funding and support – service providers

How could government support programs be reformed to better meet government objectives for ECEC?

Is there scope to simplify childcare support? What changes could be made to the way childcare support is administered to m...

1	The difference between approved care and registered care is very confusing and hard to explain to staff, let alone parents. This system could definitely be simplified. ECEC funding need definitely to have conditions applied, appropriately qualified staff is essential as well as a 600 hour annual program etc.	Jan 3, 2014 4:49 AM
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Page 2, Q35. Options for reform of childcare funding and support - parents

What financial contribution should parents be expected to make to the care and education of their children?

To what extent should governments subsidise use of childcare and early learning? Should families reasonably expect to re...

1	I believe support should directly subsidise ECEC fees.	Jan 3, 2014 4:49 AM
2	It would be wonderful if all families regardless of income could access a quality kindy program free of charge much like they can currently access the state school prep program.	Dec 13, 2013 6:13 PM

Page 2, Q37. The Productivity Commission are encouraging participants to comment on any or all issues they believe are relevant to the inquiry, please use this space to provide any further comments or issues you wish the Productivity Commission to be aware of:

1	We would hope that any decision made in relation to early childhood education would be driven by the best interests of children and their learning requirements.	Dec 13, 2013 6:13 PM
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Page 2, Q13. Government involvement in childcare and early learning

What role, if any, should the different levels of government play in childcare and early childhood education? What outcomes from ECEC are desirable and should be made achievable over the next decade?

- | | | |
|---|---|----------------------|
| 1 | Federal govt should be involved in providing uniform types of child Care and education in the EC sector. I believe the initiatives to provide access for all children have been effective. I do think there are too many be autocrats making decisions about how to ensure EC Care is of a high quality ie NQF. Continued involvement from State Govts to provide adequate funding is also essential. I believe more control and self regulation should be bestowed on each sector through their Central Governing Body as they understand local issues and objectives. | Dec 30, 2013 1:08 AM |
|---|---|----------------------|

Page 2, Q14. International models of ECEC

The Commission is seeking information on international models of childcare that may be relevant to Australia. The Commission has a particular interest in:

- how the models affect child development outcomes and workforce participation
- the cost to government, fam...

- | | | |
|---|---|----------------------|
| 1 | I strongly believe children should be with primary careers until at least 2. This means more support for families to stay at home for the first 2 years. I realise this is impractical but feel this is best for long term development of children. 2nd preference would be a family daycare model. | Dec 30, 2013 1:08 AM |
|---|---|----------------------|

Page 2, Q15. Changing demand for ECEC

The Commission is seeking empirical evidence on demand for ECEC, in particular:

- are there families from particular household structures, socioeconomic groups or geographic areas that are now using some forms of ECEC significantly more than in the past?
- which type...

- | | | |
|---|--|----------------------|
| 1 | The provision of subsidised kindy places for families on health care cards has enabled more lower income families to access Kindy. | Dec 30, 2013 1:08 AM |
|---|--|----------------------|

Page 2, Q16. Children's development needs

The Commission is seeking evidence on the effect of the different types of ECEC, including separate preschool programs, on children's learning and development and preparedness for school.

How does the amount of time spent in ECEC and the age at which a child f...

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|---|---|----------------------|
| 1 | Disgusting idea to lengthen the school day. This would be a purely economic decision to allow working parents to pick children up later. Children are all tired at the end of the traditional school day and extra time at school would not be productive in my mind. | Dec 30, 2013 1:08 AM |
|---|---|----------------------|

Page 2, Q17. Impacts on workforce participation

What is the relative importance of accessibility, flexibility, affordability and quality of ECEC (relative to other key factors) in influencing decisions of parents as to whether they work or remain at home to care for children?

What trade-offs do working ...

- | | | |
|---|--|----------------------|
| 1 | Parents are now able to return to work earlier due to subsidised child care. I don't think this is in the best interest of the children. I'm sure I'm in the minority however. | Dec 30, 2013 1:08 AM |
|---|--|----------------------|

Page 2, Q18. Availability of childcare and early learning services

The Commission is seeking evidence on:

- the extent to which parents are experiencing difficulties accessing ECEC that meets their needs/preferences and whether there are particular categories of care, times, locations or circumstances fo...

1	I don't have any information on those statistics.	Dec 30, 2013 1:08 AM
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Page 2, Q19. Availability of childcare and early learning services

The Commission is seeking information from ECEC providers on:

- how the sector has responded to growth in demand, including changes to types of care offered, cost and pricing structures used by different types of providers, and any viabili...

1	I have definite opinions on changing the existing kindergarten model however I am not in support of turning our kindergartens into longer care program's. parents have access to child care and long day care but Kindergarten is something parents choose as a unique experience.	Dec 30, 2013 1:08 AM
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Page 2, Q20. Availability of childcare and early learning services

The Commission is seeking information from employers that currently provide childcare services or assist employees to access childcare, on:

- the nature of the services or assistance provided
- issues encountered in supporting employee us...

1	I don't have information about these issues.	Dec 30, 2013 1:08 AM
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Page 2, Q21. Flexibility of childcare and early learning services

The Commission is seeking information on:

- the extent and nature of unmet demand for more flexible ECEC
- the reasons why current providers are not offering more flexible care options
- the experiences of providers who offer flexible car...

1	Parents who choose a kindy program outside long day care hours recognise the child's need for social interaction and to gradually become independent. They are aware that the 3 & 4 year old is ready for social interaction but tires easily and has had enough after 5 hours away from home. This is why parents choose the kindy program if they are able to work their family / work commitments around the hours for a year. Child are is a great service for working parents but doesn't suit all children.	Dec 30, 2013 1:08 AM
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Page 2, Q22. Services for additional needs and regional and remote areas

The Commission is seeking information on:

- how well the needs of disadvantaged, vulnerable or other additional needs children are being met by the ECEC sector as a whole, by individual types of care, and in particular regions
- the...

1	I believe a stronger partnership with specialists will improve outcomes for children with additional needs in kindergartens. If centres are able to access more funding in this area they would be able to employ visiting specialists to provide support for children & families at the Centre.	Dec 30, 2013 1:08 AM
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Page 2, Q23. Cost of childcare and early learning services in Australia

The Commission is seeking information and where possible quantitative evidence on:

- financial difficulties arising from paying childcare fees, including the types or location of families experiencing the greatest difficulties in meet...

1	C&K Affiliate centres have some flexibility with fees but this depends on the fundraising done at the centre. We are very fortunate to be able to keep fees affordable through lots of dedicated families and with the help of grants obtained (federal, state and gaming).	Dec 30, 2013 1:08 AM
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Page 2, Q24. Government regulation of childcare and early learning

The Commission is seeking up-to-date evidence, specific examples and case studies that will inform an assessment of both the benefits and costs of current regulations impacting on ECEC services.

- | | | |
|---|--|----------------------|
| 1 | Staff at centres now spend much more time on accountability and less time with children!!! Paperwork, going over our QIP and ensuring some unnecessary written work is completed takes time away from the most important aspect of an educators day... being there with the children. Many centres now have to employ relief staff to enable teachers to complete paperwork. | Dec 30, 2013 1:08 AM |
|---|--|----------------------|

Page 2, Q25. Workforce issues and the effects of the National Quality Framework

The Commission is seeking views and evidence on:

- the effect of increased staff ratios and qualification requirements on outcomes for children
- how ECEC providers are handling the pace of implementation of new staffing rat...

- | | | |
|---|---|----------------------|
| 1 | Staff qualifications are not an issue for us. | Dec 30, 2013 1:08 AM |
|---|---|----------------------|

Page 2, Q26. Workforce issues and the effects of the National Quality Framework

The Commission is seeking information on:

- initiatives of governments to address workforce shortages and qualifications, including the cost and effectiveness of these initiatives
- initiatives of providers to address their w...

- | | | |
|---|--|----------------------|
| 1 | I believe the work hours that are necessary to do a good job can deter some from the EC field. Many hours are unpaid but seen as essential as part of the job. | Dec 30, 2013 1:08 AM |
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Page 2, Q27. National Quality Framework

Are the requirements associated with more subjective aspects of the National Quality Standards, such as 'relationships with children', clear to service operators and regulatory staff? Is further guidance required?

- | | | |
|---|--|----------------------|
| 1 | Pretty clear just some anomalies with policies and procedures. | Dec 30, 2013 1:08 AM |
|---|--|----------------------|

Page 2, Q28. National Quality Framework

Could the information provided on the 'My Child' website be changed to make it more useful or accessible to families? Are there other approaches to providing information to parents about vacancies, fees and compliance that should be considered?

- | | | |
|---|---|----------------------|
| 1 | A universal waiting list for C&K centres notifying parents where and if a vacancy exists. | Dec 30, 2013 1:08 AM |
|---|---|----------------------|

Page 2, Q29. Other regulations

The Commission is seeking information on:

- how particular regulations (including the NQF) impact on the structure, operations, cost and profitability of ECEC services — for example, are services consolidating or amalgamating their operations to reduce administration costs

...

- | | | |
|---|--|----------------------|
| 1 | The NQF has meant more staff meetings and more paperwork for all teachers. While I believe this has been a worthwhile exercise in self evaluation it has greatly impacted on our work load. Staff need to be remunerated for the extra work involved in our jobs at the moment. I find the ECECA roadshows most informative. | Dec 30, 2013 1:08 AM |
|---|--|----------------------|

Page 2, Q30. Options for regulatory reform

How could the NQF and other regulations affecting ECEC be improved — both requirements and their implementation/enforcement — to be more effective and/or to reduce the compliance burden on ECEC services or workers and/or administration costs for governments?

Ar...

1	Perhaps considering the number of EC professionals in centres and their level of experience and gathering teams from an area to help other centres with their self evaluation. This would still provide an outside perspective for centres but utilise the expertise of practicing professionals as guides, mentors, colleagues.	Dec 30, 2013 1:08 AM
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Page 2, Q31. Government support for childcare and early learning

Some general questions about government support:

- How does government support to families and childcare providers impact on accessibility, flexibility and affordability of childcare?
- Is the level of overall government support for ECEC ap...

1	Yes more than adequate.	Dec 30, 2013 1:08 AM
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Page 2, Q32. Government support for childcare and early learning

Some specific questions for families claiming government support:

- Is it difficult to apply for or receive financial assistance for childcare?
- Is it straightforward to determine how much financial assistance you will receive?
- What e...

1	I'm not sure with regard to child are but this has helped those with triplets and on health care cards gain access.	Dec 30, 2013 1:08 AM
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Page 2, Q33. Government support for childcare and early learning

Some questions specifically for service providers:

- Is it confusing and/or costly to deal with the large number of programs and agencies administering ECEC support? Is there overlap, duplication, inconsistency or other inefficiencies create...

1	Not for me	Dec 30, 2013 1:08 AM
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Page 2, Q34. Options for reform of childcare funding and support – service providers

How could government support programs be reformed to better meet government objectives for ECEC?

Is there scope to simplify childcare support? What changes could be made to the way childcare support is administered to m...

1	I'm sure some are open to mismanagement or even fraud. I like the rebate with tax model.	Dec 30, 2013 1:08 AM
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Page 2, Q35. Options for reform of childcare funding and support - parents

What financial contribution should parents be expected to make to the care and education of their children?

To what extent should governments subsidise use of childcare and early learning? Should families reasonably expect to re...

1	Yes definitely support should be means tested. I don't think it is fair to pay subsidies to those who can afford to pay when students at Uni are struggling to pay HECs contributions. They are still our children and precious commodities when they grow up.	Dec 30, 2013 1:08 AM
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Page 2, Q36. Options for reform of childcare funding and support - general

Is support appropriately targeted? If not how could it be better targeted (including less targeted)?

Should a greater (or smaller) proportion of the assistance be directed to: particular regions; particular types of ECEC; ECEC u...

- | | | |
|---|---|----------------------|
| 1 | I think grandparents and family members should be able to provide childcare and receive a subsidy if they are assessed as suitable. | Dec 30, 2013 1:08 AM |
|---|---|----------------------|

Page 2, Q37. The Productivity Commission are encouraging participants to comment on any or all issues they believe are relevant to the inquiry, please use this space to provide any further comments or issues you wish the Productivity Commission to be aware of:

- | | | |
|---|---|----------------------|
| 1 | Don't fall into the trap of thinking only of economic outcomes. Children need quality 1 on 1 time with caring individuals to grow into productive adults. | Dec 30, 2013 1:08 AM |
|---|---|----------------------|

Page 2, Q13. Government involvement in childcare and early learning

What role, if any, should the different levels of government play in childcare and early childhood education? What outcomes from ECEC are desirable and should be made achievable over the next decade?

- | | | |
|---|--|----------------------|
| 1 | Nationally – the overall framework ensures consistency of early childhood education throughout Australia. State level - Many of the 7 standards were part of our previous expectations with the C&K Association of Queensland. They managed to monitor the standards with yearly affiliation visits. An advisor would visit the centre and compile a report for the committee and staff, suggesting action plans for the future. The monitoring of services by C&K (our CGB) would reduce the number of agencies required. | Dec 18, 2013 4:30 AM |
|---|--|----------------------|

Page 2, Q14. International models of ECEC

The Commission is seeking information on international models of childcare that may be relevant to Australia. The Commission has a particular interest in:

- how the models affect child development outcomes and workforce participation
- the cost to government, fam...

- | | | |
|---|---|----------------------|
| 1 | Positive: . Finland Education system is internationally renowned for providing a quality service . Reggio Emelio Negative: . England - young entry (4year olds) to formal education; Recent reviews are being made as they are seeing the negative effects of children being too young to start formal education. | Dec 18, 2013 4:30 AM |
|---|---|----------------------|

Page 2, Q15. Changing demand for ECEC

The Commission is seeking empirical evidence on demand for ECEC, in particular:

- are there families from particular household structures, socioeconomic groups or geographic areas that are now using some forms of ECEC significantly more than in the past?
- which type...

- | | | |
|---|---|----------------------|
| 1 | 1st Question: people with Concession Cards (health care cards) 2nd Question: All families would benefit from 'genuine' kindergarten programs prior to demands of the Prep year at school. | Dec 18, 2013 4:30 AM |
|---|---|----------------------|

Page 2, Q16. Children's development needs

The Commission is seeking evidence on the effect of the different types of ECEC, including separate preschool programs, on children's learning and development and preparedness for school.

How does the amount of time spent in ECEC and the age at which a child f...

- | | | |
|---|--|----------------------|
| 1 | 1st Question: We receive consistent positive feedback/comments from local schools (principals, teaching staff) regarding the excellent quality of preparedness of children exiting our Community Kindergarten. 2nd Question: Negative points - generally we see children (who have been in childcare from an early age and for extended hours) with greater social and emotional issues. These could include: . high levels of aggression . high levels of fatigue . low tolerance in social situations especially sharing . separation anxiety . hard to put into words but "some children appear to struggle/fight/manipulate a place to belong in the group". We find that this settles in time at Kindy. Is it because of the consistency of staff and peers in the Kindergarten setting? Positive points - some children are more confident in a group setting and no separation anxiety 3rd Question: Yes - not in a positive way - higher fatigue, increase in negative social issues, which all contributes to the depletion of productive and enjoyable learning. | Dec 18, 2013 4:30 AM |
|---|--|----------------------|



Page 2, Q17. Impacts on workforce participation

What is the relative importance of accessibility, flexibility, affordability and quality of ECEC (relative to other key factors) in influencing decisions of parents as to whether they work or remain at home to care for children?

What trade-offs do working ...

1	1st Question: We find in our local community that families will adjust their work commitments to attend our community kindergarten program. 2nd Question: Sadly - Yes! 3rd Question: Yes - higher demand for childcare but this doesn't equate to quality or affordability. 4th Question: Concession Cards	Dec 18, 2013 4:30 AM
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Page 2, Q18. Availability of childcare and early learning services

The Commission is seeking evidence on:

- the extent to which parents are experiencing difficulties accessing ECEC that meets their needs/preferences and whether there are particular categories of care, times, locations or circumstances fo...

1	Parents experiencing difficulties • Families who fall just outside the benchmark to qualify for a Health Care Card find it hard to manage fee payments • Some families find it hard to fit in with the times for a sessional program Identifying vacancies • We do get inquiries from the C&K website • Locally, word of mouth is very strong through local playgroup, friends and family.	Dec 18, 2013 4:30 AM
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Page 2, Q19. Availability of childcare and early learning services

The Commission is seeking information from ECEC providers on:

- how the sector has responded to growth in demand, including changes to types of care offered, cost and pricing structures used by different types of providers, and any viabili...

1	We have previously identified the community need for before and after kindy care for our sessional program however the structure of government funding would have prohibited our financial viability to proceed with this step. Waiting list – we adhere to our strict waiting list policy where no preferences are given. Positions are determined by date order on our waiting list. This is accepted as a fair and just way of managing places in our community kindergarten and this has been successful throughout the history of the kindergarten.	Dec 18, 2013 4:30 AM
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Page 2, Q20. Availability of childcare and early learning services

The Commission is seeking information from employers that currently provide childcare services or assist employees to access childcare, on:

- the nature of the services or assistance provided
- issues encountered in supporting employee us...

1	N/A	Dec 18, 2013 4:30 AM
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Page 2, Q21. Flexibility of childcare and early learning services

The Commission is seeking information on:

- the extent and nature of unmet demand for more flexible ECEC
- the reasons why current providers are not offering more flexible care options
- the experiences of providers who offer flexible car...

1	. We have previously identified the community need for before and after kindy care for our sessional program however the structure of government funding would have prohibited our financial viability to proceed with this step.	Dec 18, 2013 4:30 AM
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Page 2, Q22. Services for additional needs and regional and remote areas

The Commission is seeking information on:

- how well the needs of disadvantaged, vulnerable or other additional needs children are being met by the ECEC sector as a whole, by individual types of care, and in particular regions
- the...

1	<p>Positive: • Within our local community (Toowoomba) we have been able to access the Autistic Outreach Program and Ed Qld Advisory staff to assist us with children having specific needs. Locally we are also able to access additional assessment and programs e.g. speech therapy, occupational therapy. We are aware of families moving from remote areas to major regional centres (like Toowoomba) to access services and facilities for their children. Negative: • There is a financial burden for the kindergarten when</p>	Dec 18, 2013 4:30 AM
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additional staffing is required to support the child. It limits the amount of time an additional assistant can be employed to give one-on-one assistance for that child for the full duration of the program. • Access to funding and/or part funding usually comes to fruition later in the school year. Ideally early access would reduce the financial stress when operating a not for profit centre. • There appears to be more children presenting with and/or diagnosed with additional needs. Governments need to be aware of this and actively support facilities to meet the increasing needs of families and educators.

Page 2, Q23. Cost of childcare and early learning services in Australia

The Commission is seeking information and where possible quantitative evidence on:

- financial difficulties arising from paying childcare fees, including the types or location of families experiencing the greatest difficulties in meet...

1	<p>Families who fall just outside the benchmark to qualify for a Health Care Card/Concession cards as they may find it hard to manage fee payments. As kindergarten care providers we fall in the mid-range with our fees. We remain quite competitive in this regard as we provide a kindergarten, play-based educational program with all teachers being university trained early childhood teachers; and certificate and diploma qualified assistants. All staff respect and adhere to our annual budget constraints. Within our budget we rely heavily on our QKFS Funding to meet our financial needs. To secure our financial future we would need the assurance from the government that this funding will continue. Any cutbacks would jeopardise the affordability of kindergarten to families in our community.</p>	Dec 18, 2013 4:30 AM
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Page 2, Q24. Government regulation of childcare and early learning

The Commission is seeking up-to-date evidence, specific examples and case studies that will inform an assessment of both the benefits and costs of current regulations impacting on ECEC services.

1	<p>Our community based not-for-profit kindergarten has undergone major restructuring for 2014 to meet the impact of the NQF and current regulations. • Employ an additional teacher (to teach one kindergarten group) to allow for the director/educational leader/nominated supervisor (currently teaching two groups and will have to reduce to teaching one group in 2014) to meet the administration requirements put forward with the national reforms. The approx. cost for this restructuring is \$40,000 during 2014 – additional teacher salary; laptop; professional development; camera • Environmental and child development costs: e.g. paper towels – cost for installing and maintaining the equipment with children needing to wash their hands a minimum of 8 times per day; the new rules and regulations are inhibiting the free exploration of play environments (over-protection). While guidelines and</p>	Dec 18, 2013 4:30 AM
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regulations are necessary there appears to be an over-reliance on compliance and the paper trail needed to support new regulation. We believe that the biggest disadvantage is to the child, physically and emotionally.



Page 2, Q25. Workforce issues and the effects of the National Quality Framework

The Commission is seeking views and evidence on:

- the effect of increased staff ratios and qualification requirements on outcomes for children
- how ECEC providers are handling the pace of implementation of new staffing rat...

1	Our staff have always met the staff qualifications needed. Employ an additional teacher (to teach one kindergarten group) to allow for the director/educational leader/nominated supervisor (currently teaching two groups to only teach one group in 2014) to meet the administration requirements put forward with the national reforms.	Dec 18, 2013 4:30 AM
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Page 2, Q26. Workforce issues and the effects of the National Quality Framework

The Commission is seeking information on:

- initiatives of governments to address workforce shortages and qualifications, including the cost and effectiveness of these initiatives
- initiatives of providers to address their w...

1	In our local community there are 3 child-care centres and one not-for-profit community kindergarten (C&K). At our kindergarten, all the teaching staff are university trained and the assistants – certificate and diploma trained, who consistently work with one group, throughout the whole session. Comments from families indicate that having this high level of qualification and consistent care is very positive and a deciding factor when choosing a kindergarten program for their child.	Dec 18, 2013 4:30 AM
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Page 2, Q27. National Quality Framework

Are the requirements associated with more subjective aspects of the National Quality Standards, such as 'relationships with children', clear to service operators and regulatory staff? Is further guidance required?

1	clear and functional	Dec 18, 2013 4:30 AM
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Page 2, Q28. National Quality Framework

Could the information provided on the 'My Child' website be changed to make it more useful or accessible to families? Are there other approaches to providing information to parents about vacancies, fees and compliance that should be considered?

1	We do not access the My Child website or have not had any feedback from families regarding use of the website. Fees – are advertised on the C&K website and also vacancies (if needed in the future). Policies and procedures – one computer has been designated to holding policies for parents to access when and if needed.	Dec 18, 2013 4:30 AM
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Page 2, Q29. Other regulations

The Commission is seeking information on:

- how particular regulations (including the NQF) impact on the structure, operations, cost and profitability of ECEC services — for example, are services consolidating or amalgamating their operations to reduce administration costs

...

1	<p>Employ an additional teacher (to teach one kindergarten group) to allow for the director/educational leader/nominated supervisor (currently teaching two groups and will have to reduce to teaching one group in 2014) to meet the administration requirements put forward with the national reforms. The approx. cost for this restructuring is \$40,000 during 2014 – additional teacher salary; laptop; professional development; camera • Numerous hours of unpaid work (by teaching staff and administration staff) associated with meeting new regulations e.g. • Increased photocopying • Massive increase in emails from various agencies • Expectations of meeting the same criteria by different government agencies • Increased download limit for the internet usage We would see it as beneficial for the agencies associated with early childhood education and care to amalgamate and refine their administration so that centres are only working with one agent rather than the many that are currently being used (C&K, OECEC, ACECQA, QSA, Workforce Council, DEEWR, COAG, Commission for Children and Young People and Child Guardian, Office of Fair Trading, Australian Charities Commission, Australian Taxation Office, Workcover Queensland, Workplace Health and Safety, Department of Education and Training, and the Australian Government Department of Human Services). There is consistent and persistent duplication of regulations making it both an excessive time and financial burden.</p>	Dec 18, 2013 4:30 AM
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Page 2, Q30. Options for regulatory reform

How could the NQF and other regulations affecting ECEC be improved — both requirements and their implementation/enforcement — to be more effective and/or to reduce the compliance burden on ECEC services or workers and/or administration costs for governments?

Ar...

1	<p>Before the National Quality reforms were introduced we were answerable to the C&K Association, relicensing every 3 years by the Department of Early Childhood, and the Department of Education and Training for our funding. Our responses were sent to C&K who would inform the other agencies. Less time was required for behind the scenes paperwork allowing teachers to fulfil their teaching requirements without the paper burden currently being experienced. We would see it as beneficial for the agencies associated with early childhood education and care to amalgamate and refine their administration so that centres are only working with one agent rather than the many that are currently being used (C&K, OECEC, ACECQA, QSA, Workforce Council, DEEWR, COAG, Commission for Children and Young People and Child Guardian, Office of Fair Trading, Australian Charities Commission, Australian Taxation Office, Workcover Queensland, Workplace Health and Safety, Department of Education and Training, and the Australian Government Department of Human Services).</p>	Dec 18, 2013 4:30 AM
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Page 2, Q31. Government support for childcare and early learning

Some general questions about government support:

- How does government support to families and childcare providers impact on accessibility, flexibility and affordability of childcare?
- Is the level of overall government support for ECEC ap...

1	<ul style="list-style-type: none"> • Disability Support Grants are inadequate/limiting at providing the support necessary for some children. The excessive paperwork needed to seek grants requires review/streamlining. • The Health Care Card allows for easier access for some families • We would see it as beneficial for the agencies associated with early childhood education and care to amalgamate and refine their administration so that centres are only working with one agent rather than the many that are currently being used (C&K, OECEC, ACECQA, QSA, Workforce Council, DEEWR, COAG, Commission for Children and Young People and Child Guardian, Office of Fair Trading, Australian Charities Commission, Australian Taxation Office, Workcover Queensland, Workplace Health and Safety, Department of Education and Training, and the Australian Government Department of Human Services). The savings made from streamlining the agencies could be injected into the 'grassroots' level providing more support where the children should be getting the real benefit. 	Dec 18, 2013 4:30 AM
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Page 2, Q32. Government support for childcare and early learning

Some specific questions for families claiming government support:

- Is it difficult to apply for or receive financial assistance for childcare?
- Is it straightforward to determine how much financial assistance you will receive?
- What e...

1 Being school holidays we are unable to research an answer for this question. Dec 18, 2013 4:30 AM

From an administration aspect, receipts are provided quarterly to allow families to claim through the Family Assistance Office. Preparation of receipts would take approximately 10 hours per quarter. Three copies (per child) of the receipt are provided for the family, Family Assistance Office and an office copy (for our records).

Page 2, Q33. Government support for childcare and early learning

Some questions specifically for service providers:

- Is it confusing and/or costly to deal with the large number of programs and agencies administering ECEC support? Is there overlap, duplication, inconsistency or other inefficiencies create...

1 We would see it as beneficial for the agencies associated with early childhood education and care to amalgamate and refine their administration so that centres are only working with one agent rather than the many that are currently being used (C&K, OECEC, ACECQA, QSA, Workforce Council, DEEWR, COAG, Commission for Children and Young People and Child Guardian, Office of Fair Trading, Australian Charities Commission, Australian Taxation Office, Workcover Queensland, Workplace Health and Safety, Department of Education and Training, and the Australian Government Department of Human Services). We believe there could be some massive changes that could be made to make it more efficient. Ideally for us, working with the C&K Association, OECEC and the Department of Education and Training, would allow us to meet all necessary regulations and expectations with less administrative interference. Dec 18, 2013 4:30 AM

Page 2, Q34. Options for reform of childcare funding and support – service providers

How could government support programs be reformed to better meet government objectives for ECEC?

Is there scope to simplify childcare support? What changes could be made to the way childcare support is administered to m...

1 Currently the centre receives the Health Care payments direct to the centre. It is a process that works well and we encourage you to maintain it. The distinction between approved care and registered care providers needs to be maintained. Dec 18, 2013 4:30 AM

Page 2, Q35. Options for reform of childcare funding and support - parents

What financial contribution should parents be expected to make to the care and education of their children?

To what extent should governments subsidise use of childcare and early learning? Should families reasonably expect to re...

1 . It has been proven that a quality early childhood educational program not only provides life-long learning skills for the children attending but ultimately will save a community money in the long term. It provides a foundation to formal learning and taps into the highest growth period in a person's life. We believe that all kindergarten programs should be subsidised to their current level, ideally more. Any support provided to families would be best paid to the service to avoid another step in administration. We agree that childcare expenses should be tax deductible and would provide an advantage for low income families. Dec 18, 2013 4:30 AM



Page 2, Q36. Options for reform of childcare funding and support - general

Is support appropriately targeted? If not how could it be better targeted (including less targeted)?

Should a greater (or smaller) proportion of the assistance be directed to: particular regions; particular types of ECEC; ECEC u...

- | | | |
|---|--|----------------------|
| 1 | The national reforms were designed to put all kindergartens and child care centres on 'a level playing field'. The standards and qualities of the initial expectations for university trained teachers delivering a quality educational program for the age group should be maintained at all costs ... otherwise it has been a massive waste of money, time and energy. The quality of education for the child is being undermined with all the changes being made. As a centre that has always maintained the qualifications for the implementation of a quality early childhood program we feel we do not receive the recognition and respect for consistently maintaining the quality expected. Centres around us who take advantage of the flexibility being introduced to the standards are seen as equal within our community. Families are unaware of the discrepancies in the standards being offered between services. The governing agencies need to make well informed decisions that support early childhood teachers to deliver high quality care and education. The expectations of performance need to be realistic, achievable and sustainable workloads that don't impact on teacher's ability to deliver quality programs and affect family/home lives. | Dec 18, 2013 4:30 AM |
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Page 2, Q37. The Productivity Commission are encouraging participants to comment on any or all issues they believe are relevant to the inquiry, please use this space to provide any further comments or issues you wish the Productivity Commission to be aware of:

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| 1 | Transition statements: we question the value of the document when families elect whether to give them to the school or not. Approximately 2 hours per child is spent completing the task. Parts of the document offer value but overall we query the necessity of this document for a child of this age. As teaching staff we are disappointed at the changes made to teaching requirements for child care staff. Rather than a university trained teacher consistently working with a group of children, a university qualified staff member can be with a group for as little as 20% of the time at some centres. We have a beautiful community (not for profit) kindergarten that is becoming bogged down with the excessive paperwork. We run the risk of frightening off future committee members - volunteer parents who make up the committee responsible for the overall administration of the centre, because of the expectation of being completely knowledgeable and competent with meeting so many requirements. Historically we have always had a strong presence from families on our committee and with the changes being introduced we run the risk of affecting Quality Area 6 (collaborative partnerships with families and communities) for the first time in our centre's history. 6 people spent approximately 6.5 hours completing this survey. | Dec 18, 2013 4:30 AM |
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Page 2, Q13. Government involvement in childcare and early learning

What role, if any, should the different levels of government play in childcare and early childhood education? What outcomes from ECEC are desirable and should be made achievable over the next decade?

1	Early childhood education should have similar government involvement as schools.	Jan 16, 2014 4:18 AM
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Page 2, Q16. Children's development needs

The Commission is seeking evidence on the effect of the different types of ECEC, including separate preschool programs, on children's learning and development and preparedness for school.

How does the amount of time spent in ECEC and the age at which a child f...

1	I believe a kindergarten/pre prep program should be brought into schools. On entry to school children who have attended and ECEC are much more ready to start learning. Bringing this into schools will ensure more children are ready for school, whereas now (especially in our area) only those who can afford to send their child to kindy will do it.	Jan 16, 2014 4:18 AM
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Page 2, Q17. Impacts on workforce participation

What is the relative importance of accessibility, flexibility, affordability and quality of ECEC (relative to other key factors) in influencing decisions of parents as to whether they work or remain at home to care for children?

What trade-offs do working ...

1	It is the increased workforø participation of both parents (out of need) that has increased the demand for childcare.	Jan 16, 2014 4:18 AM
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Page 2, Q18. Availability of childcare and early learning services

The Commission is seeking evidence on:

- the extent to which parents are experiencing difficulties accessing ECEC that meets their needs/preferences and whether there are particular categories of care, times, locations or circumstances fo...

1	Living in a rural area makes it very difficult to access any registered care (and therefore claim any benefits) - very unfair.	Jan 16, 2014 4:18 AM
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Page 2, Q31. Government support for childcare and early learning

Some general questions about government support:

- How does government support to families and childcare providers impact on accessibility, flexibility and affordability of childcare?
- Is the level of overall government support for ECEC ap...

1	The level of government support for kindergartens is not appropriate. Whilst they are saying (and we know) how important kindergarten is to a child's learning and development - it is still a huge financial burden. I believe if a pre-prep program was installed in schools more families would send children thus improving results in the early years of schooling. Being within school administration I believe would somewhat reduce the current costs?	Jan 16, 2014 4:18 AM
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Page 2, Q32. Government support for childcare and early learning

Some specific questions for families claiming government support:

- Is it difficult to apply for or receive financial assistance for childcare?
- Is it straightforward to determine how much financial assistance you will receive?
- What e...

1	Hasn't reduced out of pocket expenses in stand-alone community kindergartens. There is still a huge need to fundraise and unfortunately to raise fees.	Jan 16, 2014 4:18 AM
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Page 2, Q35. Options for reform of childcare funding and support - parents

What financial contribution should parents be expected to make to the care and education of their children?

To what extent should governments subsidise use of childcare and early learning? Should families reasonably expect to re...

- | | | |
|---|---|----------------------|
| 1 | Parents should make a significant financial contribution to the care and education of their children. Parents shouldn't expect "everything". More support should be offered to larger families. Support should be paid direct to services. Childcare assistance should be subject to income level tests and working tests etc for children up to pre-prep age, however by pre-prep/kindy all children should be granted assistance to ensure close to full enrolment in kindy programs. This will ensure better results for our children in school. | Jan 16, 2014 4:18 AM |
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Page 2, Q36. Options for reform of childcare funding and support - general

Is support appropriately targeted? If not how could it be better targeted (including less targeted)?

Should a greater (or smaller) proportion of the assistance be directed to: particular regions; particular types of ECEC; ECEC u...

- | | | |
|---|--|----------------------|
| 1 | Kindergaraten programs need greater funding. In-home care should definately be supported as registered care. | Jan 16, 2014 4:18 AM |
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APPENDIX B: SUGGESTED RESEARCH

Suggested references for the Productivity Commission to review and consider include:

1. Heckman 101 – How to invest in early childhood development for better education, health and economic returns – www.heckmanequation.org
2. Organisation for Economic Cooperation and Development (OECD) including Starting Strong Reports and Education at a Glance Reports – www.oecd.org/education
3. The Scottish Government (March, 2013). Early childhood education and care provision: International review of policy, delivery and funding - www.scotland.gov.uk/Publications/2013/03/4564/5
4. Longitudinal studies of Australian children and Indigenous children (visit <http://www.growingupinaustralia.gov.au> and <http://www.dss.gov.au>)
5. Effective Early Educational Experiences (E4Kids) Australian Research Council study by the University of Melbourne and Queensland University of Technology (visit http://education.unimelb.edu.au/news_and_activities/projects/E4Kids#about)
6. Rutter, Evans and Singler (December 2012). Supporting London local government to deliver free early education for disadvantaged two-year-olds - <http://www.londoncouncils.gov.uk/policylobbying/children/publications/twoyearoldentitlement.htm>
7. Victorian Government (December 2004). Breaking cycles, building futures. Promoting inclusion of vulnerable families in antenatal and universal early childhood services: A report on the first three stages of the project - <http://www.healthinfonet.ecu.edu.au/key-resources/bibliography/?lid=3504>
8. *Preparing for school: Report of the Queensland Preparing for School Trials 2003/4* by Thorpe, Karen J. and Tayler, Collette P. and Bridgstock, Ruth S. and Grieshaber, Susan J. and Skoien, Petra V. and Danby, Susan J. and Petriwskyj, Anne (2004) - <http://eprints.qut.edu.au/10192/1/10192.pdf>
9. The factors that influence kindergarten participation in Queensland – <http://deta.qld.gov.au/earlychildhood/pdfs/access-report.pdf>
10. E4Kids Study - http://education.unimelb.edu.au/news_and_activities/projects/E4Kids